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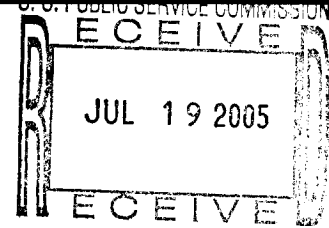
C. DUKES SCOTT  
EXECUTIVE DIRECTOR

P.O. Box 11263  
Columbia, S.C. 29211



Phone: (803) 737-0800  
Fax: (803) 737-0801

DAN F. ARNETT  
CHIEF OF STAFF



July 18, 2005

**VIA U.S. MAIL**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
**South Carolina Public Service Commission**  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

Re: Petition of the Office of Regulatory Staff to Request Forfeiture of the  
Bond and to Request Authority to Petition the Circuit Court for  
Appointment of a Receiver.  
**PSC Docket No.: 2005-110-W/S**

Dear Mr. Terreni:

✓ For your docket, please find enclosed a copy of the Office of Regulatory Staff's  
Second Continuing Data Request which was served on counsel for Piney Grove Utilities,  
Inc. Also, if you would please date stamp the extra copy enclosed a return it to me in the  
enclosed self-addressed stamped envelope.

Please let me know if you have any questions.

Sincerely,

  
Benjamin P. Mustian

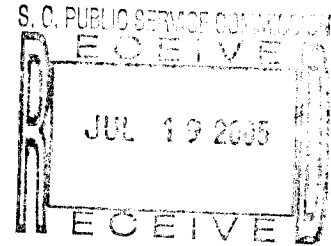
BPM/rng

Enclosures

cc: D. Reece Williams, IV, President (w/enclosure)  
Louis Lang, Esquire (w/enclosure)  
Jessica J.O. King, Esquire (w/enclosure)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**

**DOCKET NO. 2005-110-W/S**



IN RE: Petition of the Office of Regulatory )  
Staff to Request Forfeiture )  
of the Piney Grove Utilities, Inc. )  
Bond And to Request Authority )  
To Petition the Circuit Court for )  
Appointment of a Receiver )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S SECOND CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below:


**VIA CERTIFIED MAIL**

Louis Lang, Esquire  
**Callison, Tighe & Robinson, LLC**  
1812 Lincoln Street, Suite 200  
Columbia, SC 29202-1390

D. Reece Williams, IV, President  
**Piney Grove Utilities, Inc.**  
49 Archdale Street  
Charleston, SC 29401

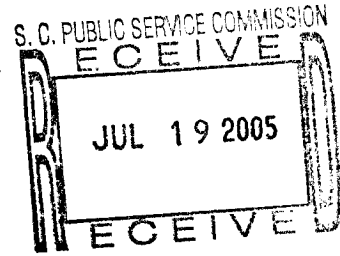
**VIA U.S. MAIL**

Jessica J.O. King, Esquire  
**DHEC**  
2600 Bull Street  
Columbia, SC 29201

  
\_\_\_\_\_  
Rena Grant

July 18, 2005  
Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2005-110-W/S**



IN RE: Petition of the Office of Regulatory )  
Staff to Request Forfeiture )  
of the Piney Grove Utilities, Inc. )  
Bond And to Request Authority )  
To Petition the Circuit Court for )  
Appointment of a Receiver )  
\_\_\_\_\_ )

**OFFICE OF REGULATORY STAFF'S  
SECOND CONTINUING  
DATA REQUEST**

**TO: LOUIS H. LANG, ESQUIRE, ATTORNEY FOR THE RESPONDENT, PINEY GROVE UTILITIES, INC.**

**INSTRUCTIONS**

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, title, and current address and telephone number of the person. When asked to identify a document, "identify" means to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is

used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings. As used in this data request, "address" means mailing address and business address.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS HEREIN REQUESTED:

- A. That all information shall be provided to the undersigned in the format as requested.
- B. That all responses to the requests below be labeled using the same numbers as used herein.
- C. That each of the enumerated data requests be reproduced at the beginning of each of the responses.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the data request in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.
- F. That all exhibits be reduced to 8 ½" x 11" format, where practical.
- G. That the requested information be bound in ring binders (loose leaf notebooks) or otherwise suitably bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each response be indicated.

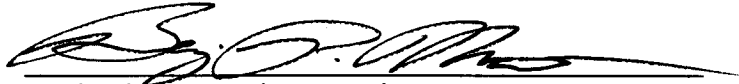
- I. That the Company provide to the Office of Regulatory Staff two copies of the responses to this data request as soon as possible but no later than ten (10) days after service thereof.
- J. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- K. This data request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

### **QUESTIONS**

- 2.1 Provide a detailed listing of the number of residential and commercial customers as of December 31, 2003 and March 1, 2005. Provide a detailed breakdown by customer classification, service type provided, and specific subdivision.
- 2.2 What land & land rights does Piney Grove Utilities, Inc. own and where is it located. Indicate the years each was purchased and its purchase price. Please state the appraised values of the land.
- 2.3 Subsequent to the last rate case, has there been any change in the ownership of Piney Grove Utilities, Inc.? If so, provide a listing of the owners of the Company. Was the change in ownership approved by the Commission? If so, please identify the docket in which the Commission addressed the change of ownership of the Company? Identify the current owners of Piney Grove Utilities, Inc.
- 2.4 List by year the total number of bills issued to customers during the years 2003, and 2004.
- 2.5 List the Piney Grove Utilities, Inc. assets pledged for any loans.
- 2.6 Provide a copy of any and all loan agreements, its applicable amortization schedule, and any other relevant documentation.
- 2.7 Provide a schedule showing when salaries of Piney Grove Utilities, Inc. employees are paid and pay stubs for three consecutive pay periods for officers and staff.
- 2.8 Provide a schedule detailing the amount of bonuses received by Piney Grove Utilities, Inc. officers, owners and employees during the year 2004.

- 2.9 Provide a copy of all federal and state income tax returns signed and filed by Piney Grove Utilities, Inc. for tax year 2004. This request includes all supporting schedules and documents, such as 1099s, and the like, whether filed or not.
- 2.10 Provide a copy of the complete customer complaint log detailing all recorded customer complaints for the year 2004 pertaining to sewer/wastewater collection and treatment systems owned by Piney Grove Utilities, Inc.
- 2.11 Provide a copy of the complete customer complaint log detailing all recorded customer complaints for the year of 2004 pertaining to the drinking water system owned by Piney Grove Utilities, Inc.
- 2.12 Provide a copy of Piney Grove Utilities, Inc.'s annual report that was required to be filed with the PSC for 2001, 2002, 2003, and 2004.
- 2.13 Provide the following information:
- a. How can a customer contact the company after hours?
  - b. How can a customer contact the utility during an emergency?
  - c. How customers are notified of their ability to contact the Company after hours or during an emergency?
- 2.14 Provide complete Accounts Receivable ledgers documenting each customer account and all transactions for the year ending 12/31/2004. Information to be included includes customer number, monthly invoice and payment history, current and previous account balances, late fees/payments, disconnect/reconnect fees/payments, return check fees/payments, and delinquency status.
- 2.15 Does the Company have any plans to install individual cutoff valves for customers? Please provide detailed information concerning these plans.
- 2.16 Justify the current charge of a \$90.00 deposit and a \$5.00 late (penalty) fee charge. How much revenue from deposits has been collected from customers during the year ending December 31, 2004? How much revenue from late fees has been collected from customers during the year ending December 31, 2004?
- 2.17 How is the Company made aware of new customers in the Lloydwood and Franklin Park Subdivisions?
- 2.18 Please describe the system(s) which provides water and wastewater services being provided to the Franklin Park and Lloydwood Subdivisions. Provide details of the systems capacity to deliver these services. Include information with respect to DHEC, local and federal regulatory compliance status.
- 2.19 Provide written cost documentation for maintenance and repair work at the wastewater treatment facility (i.e., spray effluent pump replacement, aerator repair, grass cutting, etc.) for the years 2004 and 2005.

- 2.20 Provide documentation for the cost for repair of line breakages, dates, and extent of breakage.
- 2.21 Provide all invoice copies for the following expense categories listed on the Company's Exhibit J "Cost Analysis Sheet – Piney Grove Utilities, Inc." prepared November 2004 provided to ORS under First Continuing Data Request:
- a. USA BlueBook
  - b. Piedmont Cleaning
  - c. City of Cayce
  - d. SCE&G
  - e. Meetze Plumbing
  - f. SCDHEC
- 2.22 Provide a copy of the wastewater treatment facility operator site visit log for the Franklin Park sewer system.
- 2.23 Provide a copy of the water system operator site visit log for the Franklin Park water system.
- 2.24 Provide a copy of the water system operator site visit log for the Albene Park water system.



Benjamin P. Mustian, Esquire  
**Office of Regulatory Staff**  
P.O. Box 11263  
Columbia, South Carolina 29211

July 18, 2005

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

P.O. Box 11263  
Columbia, S.C. 29211



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Fax: (803) 737-0801

DAN F. ARNETT  
CHIEF OF STAFF

July 18, 2005

**VIA CERTIFIED MAIL NO. 7005 0390 0002 7821 5766**

D. Reece Williams, IV, President  
**Piney Grove Utilities, Inc.**  
49 Archdale Street  
Charleston, SC 29401

Re: Petition of the Office of Regulatory Staff to Request Forfeiture of the  
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**PSC Docket No.: 2005-110-W/S**

Dear Mr. Williams:

Enclosed please find a copy of the Office of Regulatory Staff's Second  
Continuing Data Request in the above-referenced matter.

Please let me know if you have any questions.

Sincerely,



Benjamin P. Mustian

BPM/rng  
Enclosure

cc: Charles L.A. Terreni

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

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DAN F. ARNETT  
CHIEF OF STAFF

July 18, 2005

**VIA CERTIFIED MAIL NO. 7005 0390 0002 7821 5773**

Louis Lang, Esquire  
**Callison, Tighe & Robinson, LLC**  
1812 Lincoln Street, Suite 200  
Columbia, SC 29202-1390

Re: Petition of the Office of Regulatory Staff to Request Forfeiture of the  
Bond and to Request Authority to Petition the Circuit Court for  
Appointment of a Receiver.  
**PSC Docket No.: 2005-110-W/S**

Dear Mr. Lang:

Enclosed please find a copy of the Office of Regulatory Staff's Second  
Continuing Data Request in the above-referenced matter.

Please let me know if you have any questions.

Sincerely,

Benjamin P. Mustian

BPM/rmg  
Enclosure

cc: Charles L.A. Terreni